

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**MOTION TO INFORM FRESenius MEDICAL CARE'S
APPEARANCE AT THE JUNE 8, 2023 OMNIBUS HEARING**

COMES NOW Fresenius Medical Care (hereafter "FMC"), a creditor, by and through the undersigned legal counsel, and respectfully submits this motion in compliance with the Court's *Order Regarding Procedures for Hearing on June 8, 2023, Omnibus Hearing* (Dkt. No. 24, 336) (the "Scheduling Order):

1. Attorneys Nayuan Zouairabani and/ or Victoria Rivera Llorens of McConnell Valdés, LLC will appear on behalf of FMC at the June 8, 2023 omnibus hearing (the "Hearing"), which will be conducted in Courtroom 17C of the Daniel Patrick Moynihan Courthouse, 500 Pearl Street, New York, NY 10007 (the "New York Courtroom"), and by video teleconference in a

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico ("Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566- LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Building Authority ("PBA") (Bankruptcy Case No. 19 BK 5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

courtroom to be designated in the United States District Court for the District of Puerto Rico, Clemente Ruiz Nazario US Courthouse, 150 Carlos Chardón Street, Federal Building, San Juan, Puerto Rico 00918-1767 (the “San Juan Courtroom”).

2. In compliance with the Scheduling Order, attorneys Zouairabani and Rivera Llorens hereby inform that they will appear at the Hearing in person in the San Juan Courtroom.

3. The email address of Mr. Zouairabani is nzt@mcvpr.com and of Ms. Rivera Llorens is vrll@mcvpr.com. Further, Mr. Zouairabani and Ms. Rivera Llorens hereby submit their Party Appearance Cover Sheet as **Exhibit A** to this motion.

4. FMC reserves the right to be heard and present oral argument on any matter identified in the agenda to be filed by the Oversight Board in connection with the Hearing, or to address any statement or issue that may be raised by any party at the Hearing related to the Title III cases and/or the adversary proceedings which may affect the interests of FMC. FMC also reserves the right to amend this motion as needed.

WHEREFORE, FMC respectfully requests the Court to take note of the foregoing and deem it in compliance with the Scheduling Order.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 31st day of May, 2023.

CERTIFICATE OF SERVICE: In accordance with Fed. R. Bankr. P. 9014(b), Fed. R. Bankr. P. 7004(b), and the Court’s *Sixteenth Amended Notice, Case Management and Administrative Procedures Order* (Dkt. No. 20190-1) (the “CMP Order”), we hereby certify that a true and exact copy of the foregoing was sent by electronic mail upon all the parties listed in the Master Service List and by U.S. mail upon all the Standard Parties listed in the CMP Order.

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